

July 10, 2025

VIA ECF

Honorable Dale E. Ho United States District Judge **United States District Court** Southern District of New York 40 Foley Square New York, NY 10007

> Carnegie Hospitality, LLC v. Parkerose LLC et al Re: Civil Case No.: 1:25-cv-04869-DEH

Jointly Made Letter Motion to Adjourn the Initial Conference, Currently Scheduled for July 17, 2025, and the Deadline for Submission of a Proposed Case Management Order

Dear Respected District Judge Ho:

We represent Plaintiff Carnegie Hospitality, LLC ("Plaintiff") and write jointly with Defendants' counsel, pursuant to Rules 2(a) and (e) of Your Honor's Individual Rules and Practices with relation to Your Honor's Order dated June 13, 2025, directing the parties to jointly submit a proposed Civil Case Management Plan and Scheduling Order and related documents, and scheduling an initial conference for July 17, 2025, at 11.00 a.m. (ECF 11).

In this matter, the Defendants waived formal service of the summons, which extended their time to respond to the complaint to 60 days. Counsel for the Parties met and conferred on July 9, 2025. In light of the recent appearance of defense counsel on July 9, 2025, and the extended deadline for Defendants' response to the Complaint—August 18, 2025—the parties respectfully request an adjournment of the initial conference to a date in August, or thereafter, subsequent to Defendants' responsive pleading deadline. The parties further request that the deadline to submit the proposed case management plan be adjusted accordingly based on the new date of the initial conference. Such an adjournment will permit the parties and the Court to reasonably address the positions advanced by the parties with a complete set of pleadings.

This is the first request for an adjournment, the application is made on consent of all parties, and there are no other appearances currently scheduled before Your Honor.

We thank the Court for its attention to this matter and are available should the Court require any additional information.

Respectfully submitted,

<u>/s/ Eleni Melekou</u> Eleni Melekou

cc (via ECF):

David Lin, Esq.

Application GRANTED. The conference currently scheduled for July 17, 2025 at 11:00 A.M. is ADJOURNED to **September 4, 2025 at 10:00 A.M.** The parties should dial in by calling (646) 453-4442 and entering the Phone Conference ID: 420 796 135, followed by the pound (#) sign. Additionally, in accordance with Paragraph 3.c of the Court's Individual Practices, the parties are hereby ORDERED to file on ECF a joint letter as well as a proposed Civil Case Management Plan and Scheduling Order attached as an exhibit to the joint letter, **no later than Thursday of the week prior to the conference date**. The Clerk of Court is respectfully directed to terminate ECF No. 15. SO ORDERED.

Dale E. Ho

United States District Judge

Dated: July 11, 2025 New York, New York

Jh H